

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JUAN QUINTANILLA VASQUEZ,
GABRIELA PERDOMO ORTIZ, and VICTOR
HUGO CATALAN MOLIN, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

LIBRE BY NEXUS, INC. and JOHN DOES
1-50,

Defendants.

Case No. 4:17-cv-755-CW

[PROPOSED] JUDGMENT

Pursuant to this Court's October 3, 2022 Order For Civil Contempt Sanctions Against Defendant, Defendant Libre By Nexus, Inc. ("LBN") is liable for \$2,158,350.77, immediately due and payable to Plaintiffs as of February 6, 2023.

The total amount of \$2,158,350.77 now due and payable includes:

1. \$1,590,000 that LBN has owed since October 17, 2022, pursuant to the Court's October 3, 2022 civil contempt orders enforcing the parties' settlement agreement.
2. \$74,952.00 for Plaintiffs' attorneys' fees incurred for their November 2022 motion for civil contempt sanctions against Donovan, Ajin, and Moore.
3. \$34,142.60 for Plaintiffs' attorneys' fees for their 2021 motion to enforce, plus \$2,473.15 interest¹ from July 30, 2021, to February 6, 2023.
4. \$53,021.60 for Plaintiffs' attorneys' fees for their August 2022 civil contempt motion, plus \$761.42 interest from October 17, 2022, to February 6, 2023.

¹ Interest, for the purpose of this judgment, was calculated "at a rate equal to the weekly average 1-year constant maturity Treasury yield, as published by the Board of Governors of the Federal Reserve System, for the calendar week preceding the date of the judgment." 28 U.S.C. § 1961(a). Interest was computed daily and compounded annually. 28 U.S.C. § 1961(b).

[PROPOSED] JUDGMENT

Vasquez v. Libre by Nexus, Inc., No. 4:17-cv-00755-CW

1 5. \$403,000 in total sanctions for LBN's failure to make payments and provide records as set
2 forth in the Court's October 3, 2022 civil contempt orders, from October 10 or 17, 2022,
3 as provided by the Court for each of the respective sanctions, through January 23, 2023.

4 Class Counsel and/or Plaintiffs are authorized to collect and receive such payments
5 through judgment collection and enforcement procedures, provided that they will then transfer
6 these amounts to the Administrator for distribution.

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8 **IT IS SO ORDERED**

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10 DATED:

11 _____
12 Honorable Claudia Wilken
13 United States District Judge
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